# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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UNITED STATES OF AMERICA

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V.

S

CR. NO. H-17S

SHEILETTA McGREW

Status Courts
Southern District of Texas
FILED

DEC 1 4 2017

#### **INDICTMENT**

17 CR 7 4 5

THE GRAND JURY CHARGES:

## <u>COUNTS 1-9</u> (THEFT OF GOVERNMENT MONEY – 18 U.S.C. §641)

#### A. THE SCHEME AND ARTIFICE

1. From on or about January 1, 2010 until on or about April 6, 2017, in the Houston Division of Southern District of Texas and elsewhere,

### SHEILETTA McGREW,

defendant herein, aided and abetted by others known and unknown to the grand jury, did knowingly and willfully steal and convert to her own use money and any thing of value of the United States and any department or agency thereof, of a value exceeding \$1,000, in violation of Title 18, United States Code, Section 641, as more fully set forth in the counts below.

## B. MANNER AND MEANS OF THE SCHEME AND ARTIFICE

- The defendant owned a tax preparation business called BABY STEPS 4
   ME. She operated this business from her residence in Houston, Texas.
- 3. The defendant unlawfully acquired the personal identifying information (PII) of numerous individuals. PII includes name, date of birth, social security number and other sensitive personal information.

- 4. The Defendant used the unlawfully acquired PII to file false and fraudulent income tax returns with the Internal Revenue Service (IRS). She transmitted the returns electronically from her residence. The Defendant submitted the fraudulent returns without the consent of the taxpayers listed on the returns.
- 5. The Defendant requested a refund from the IRS in each of the fraudulently filed returns. She requested that the refunds be sent to her by having them directly deposited into bank accounts that she controlled, and by requesting that store value cards be mailed to addresses she controlled.
- 6. The Defendant filed at least eighty-two (82) fraudulent returns during this scheme and received fraudulent refunds in the amount of \$257,765.

## C. EXECUTION OF THE SCHEME AND ARTIFICE

7. On or about the following dates, the defendant executed the scheme and artifice set forth above by knowingly receiving IRS refunds into bank accounts she controlled, as described in the counts below:

COUNT	DATE RETURN FILED	AMOUNT OF REFUND RECEIVED	VICTIM
ONE	May 28, 2012	\$2,145	C.B.
TWO	January 22, 2013	\$8,394	E.S.
THREE	January 22, 2013	\$1,238	J.M.
FOUR	January 22, 2013	\$2,057	C.D.
FIVE	January 28, 2013	\$1,152	J.B.
SIX	June 17, 2013	\$2,278	L.J.
SEVEN	October 15, 2014	\$1,175	C.M.
EIGHT	March 2, 2015	\$8,446	N.A.
NINE	January 15, 2016	\$7,571	S.B.

In violation of Title 18, United States Code, Sections 641 and 2.

## COUNTS 10-18 (AGGRAVATED IDENTITY THEFT - 18 U.S.C. §1028A)

On or about April 6, 2017, in the Houston Division of Southern District of Texas and elsewhere,

#### SHEILETTA McGREW,

defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another, that is, the name, social security number and date of birth, of the real persons listed in the counts below, during and in relation to a violation of 18 U.S.C. §641 (Theft of Government Money), by filing a false and fraudulent tax return using the means of identification of the victim, knowing that the means of identification belonged to another actual person, as described in the counts below:

COUNT	DATE	VICTIM
TEN	May 28, 2012	C.B.
ELEVEN	January 22, 2013	E.S.
TWELVE	January 22, 2013	J.M.
THIRTEEN	January 22, 2013	C.D.
FOURTEEN	January 28, 2013	J.B.
FIFTEEN	June 17, 2013	L.J.
SIXTEEN	October 15, 2014	C.M.
SEVENTEEN	March 2, 2015	N.A.
EIGHTEEN	January 15, 2016	S.B.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

TRUE BILL:

Original signature on File FOREPERSON OF THE GRAND JURY

ABE MARTINEZ

Acting United States Attorney

Ву:

ant/United States Attorney